

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

THE REPUBLIC OF KAZAKHSTAN,

Plaintiff,

v.

DOES 1-100 INCLUSIVE,

Defendants.

CIVIL ACTION

Case No. 1:15-cv-01900-ER

NOTICE OF MOTION

TO PLAINTIFF REPUBLIC OF KAZAKHSTAN AND ALL COUNSEL OF RECORD:

PLEASE TAKE NOTICE, that upon the accompanying Nonparties' Memorandum of Law in Support of their Motion for Clarification of Preliminary Injunction Order, the Declaration of David Greene and the exhibits thereto, and upon all the pleadings and proceedings heretofore had herein, Nonparties Respublika and LLC Media-Consult (collectively, "Nonparties" or "Respublika") hereby move this Court, before the Honorable Edgardo Ramos, United States District Judge for the Southern District of New York, at the Thurgood Marshall United States Courthouse, located at 40 Foley Square, Courtroom 619, New York, New York 10007, at a time to be set by this Court, to clarify that its March 20, 2015 Order Granting Plaintiff Republic of Kazakhstan's Motion for Preliminary Injunction does not extend to Respublika, and for such other and further relief as the Court deems appropriate.

PLEASE TAKE FURTHER NOTICE that, pursuant to Local Rule 6.1(b), answering papers, if any, are to be filed and served by August 18, 2015; and reply papers, if any, are to be filed and served by August 25, 2015.

Dated: August 4, 2015

Respectfully submitted,

By: /s/ James Rosenfeld
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